

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

POSITION OF THE GOVERNMENT WITH RESPECT TO SENTENCING FACTORS

AND NOW comes the United States of America by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Maureen Sheehan-Balchon, Assistant United States Attorney for said District, and pursuant to Local Criminal Rule 32.1(D) of the Local Rules of this Court, respectfully represents as follows:

1. The Government received the Presentence Report for Amanda Nichelle Downs, and subsequently conferred with United States Probation Officer Specialist, Michael Howard, and Defense Counsel, Arthur T. McQuillan, Esquire, regarding the contents of the Presentence Report.

2. Pursuant to the Sentencing Guidelines, the Government hereby gives notice it has adopted the findings of the Presentence Report.

Respectfully submitted,

CINDY K. CHUNG
United States Attorney
PA ID No. 317227

/s/ Maureen Sheehan-Balchon
MAUREEN SHEEHAN-BALCHON
Assistant U.S. Attorney
PA ID No. 78059

CERTIFICATION

I hereby certify that I have previously discussed the above matters with the probation officer and counsel for Defendant. The government has no objections and has adopted the findings of the Presentence Report.

Dated May 20, 2022

/s/ Maureen Sheehan-Balchon
MAUREEN SHEEHAN-BALCHON
Assistant U.S. Attorney
PA ID No. 78059